

Statement of Basis of the Federal Operating Permit

Westlake Longview Corporation

Site/Area Name: P3 - Polyethylene No. 3

Physical location: 2290 Callahan Rd

Nearest City: Longview

County: Harrison

Permit Number: O1967

Project Type: Renewal

Standard Industrial Classification (SIC) Code: 2821

SIC Name: Plastics Materials

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

- A description of the facility/area process description;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: April 3, 2014

Operating Permit Basis of Determination

Permit Area Process Description

The Polyethylene Plant 3 manufactures high density and linear low density polyethylene from ethylene, alpha olefins and hydrogen in a continuous process. The major process steps include raw materials handling and storage, reaction, separation, and product storage and transfer. Emission units are reactors, process tanks, product handling system, storage tanks and product loading. There are also fugitive equipment leaks. Emissions control devices are flares and particulate filters. The major pollutants are VOC and PM.

The polyethylene pilot plant, added to this area in October, 2001, manufactures high density and linear low density polyethylene from ethylene, alpha olefins and hydrogen in a continuous process. The steps include feedstock and raw materials storage and handling, reaction, separation, product storage and product transfer. The emission units are storage tanks and process tanks. Flares are used as control devices. There are sources of fugitive equipment leaks, heat exchanger leaks and wastewater. Types of emissions generated are volatile organic compounds (VOC) and particulate matter (PM).

FOPs at Site

The “application area” consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: O1969, O1983

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, NOX, HAPS, CO
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Reading State of Texas’s Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as “applicable requirements”) that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
 - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - Additional Monitoring Requirements
 - New Source Review Authorization Requirements
 - Compliance Requirements

- Protection of Stratosphere Ozone
- Permit Location
- Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - Additional Monitoring Requirements
 - Permit Shield
 - New Source Review Authorization References
 - Compliance Plan
 - Alternative Requirements
- Appendix A
 - Acronym list

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the “index number,” detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce

visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	Yes
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CAIR (Clean Air Interstate Rule)	No

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.

21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled “Basis for Applying Permit Shields” specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination *
PE146T370	40 CFR Part 60, Subpart Kb	60KB-0004	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia Storage Vessel Description = Fixed roof with an internal floating roof using two seals mounted one above the other to form a continuous closure
PE252T740	40 CFR Part 60, Subpart Kb	60KB-0005	Product Stored = Stored product other than volatile organic liquid or petroleum liquid
PE256T141	40 CFR Part 60, Subpart Kb	60KB-0001	Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
PE256T260	40 CFR Part 60, Subpart Kb	60KB-0002	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 2.2 psia but less than 4.0 psia Storage Vessel Description = Closed vent system (CVS) with a flare used as the control device (fixed roof)
PE256T260	40 CFR Part 63, Subpart FFFF	63FFFF-0004	Designated HAL = The emission stream is not designated as halogenated. Emission Standard = HAP vapor pressure is less than 76.6 and a flare is being used for control per § 63.2470(a)-Table 4.1.b.iii. Determined HAL = The emission stream is determined not to be halogenated. Prior Eval = The data from a prior evaluation or assessment is not being used. Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or a waiver was not requested. Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure. Bypass Line = The closed vent system does not contain a bypass line that could divert the vent stream away from the control device.
PE256T290	40 CFR Part 60, Subpart Kb	60KB-0003	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 2.2 psia but less than 4.0 psia Storage Vessel Description = Closed vent system (CVS) with a flare used as the control device (fixed roof)
PE256T290	40 CFR Part 63, Subpart FFFF	63FFFF-0004	Designated HAL = The emission stream is not designated as halogenated. Emission Standard = HAP vapor pressure is less than 76.6 and a flare is being used for control per § 63.2470(a)-Table 4.1.b.iii. Determined HAL = The emission stream is determined not to be halogenated. Prior Eval = The data from a prior evaluation or assessment is not being used. Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or a waiver was not requested. Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure. Bypass Line = The closed vent system does not contain a bypass line that could divert the vent stream away from the control device.
PE256TWC	40 CFR Part 60, Subpart Kb	60KB-0006	Product Stored = Waste mixture of indeterminate or variable composition Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia

Unit ID	Regulation	Index Number	Basis of Determination*
PEo85FL1	30 TAC Chapter 111, Visible Emissions	R1111-0001	ACID GASES ONLY [REG I] = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. EMERGENCY/UPSET CONDITIONS ONLY [REG I] = Flare is used under conditions other than emergency or upset conditions.
PEo85FL1	40 CFR Part 60, Subpart A	60A-0001	SUBJECT TO 40 CFR 60.18 = Flare is subject to 40 CFR § 60.18. ADHERING TO HEAT CONTENT SPECIFICATIONS = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4). FLARE ASSIST TYPE [NSPS A, NESHAP A, AND/OR MACT A] = Non-assisted FLARE EXIT VELOCITY [NSPS A, NESHAP A, AND/OR MACT A] = Flare exit velocity is less than 60 ft/s (18.3 m/sec)
PEo85FL1	40 CFR Part 63, Subpart A	63A-0001	REQUIRED UNDER 40 CFR 63 = Flare is required by a Subpart under 40 CFR Part 63. HEAT CONTENT SPECIFICATION = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8). FLARE ASSIST TYPE = Non-assisted FLARE EXIT VELOCITY = Flare exit velocity is less than 60 ft/s (18.3 m/sec)
PE146FL2	30 TAC Chapter 111, Visible Emissions	R1111-0002	ACID GASES ONLY [REG I] = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. EMERGENCY/UPSET CONDITIONS ONLY [REG I] = Flare is used under conditions other than emergency or upset conditions.
PE146FL2	40 CFR Part 60, Subpart A	60A-0002	SUBJECT TO 40 CFR 60.18 = Flare is subject to 40 CFR § 60.18. ADHERING TO HEAT CONTENT SPECIFICATIONS = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4). FLARE ASSIST TYPE [NSPS A, NESHAP A, AND/OR MACT A] = Non-assisted FLARE EXIT VELOCITY [NSPS A, NESHAP A, AND/OR MACT A] = Flare exit velocity is less than 60 ft/s (18.3 m/sec)
PE146FL2	40 CFR Part 63, Subpart A	63A-0002	REQUIRED UNDER 40 CFR 63 = Flare is required by a Subpart under 40 CFR Part 63. HEAT CONTENT SPECIFICATION = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8). FLARE ASSIST TYPE = Non-assisted FLARE EXIT VELOCITY = Flare exit velocity is less than 60 ft/s (18.3 m/sec)
RD128FL1	30 TAC Chapter 111, Visible Emissions	R1111-0003	ACID GASES ONLY [REG I] = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. EMERGENCY/UPSET CONDITIONS ONLY [REG I] = Flare is used under conditions other than emergency or upset conditions.
RD128FL1	40 CFR Part 60, Subpart A	60A-0003	SUBJECT TO 40 CFR 60.18 = Flare is subject to 40 CFR § 60.18. ADHERING TO HEAT CONTENT SPECIFICATIONS = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4). FLARE ASSIST TYPE [NSPS A, NESHAP A, AND/OR MACT A] = Non-assisted FLARE EXIT VELOCITY [NSPS A, NESHAP A, AND/OR MACT A] = Flare exit velocity is less than 60 ft/s (18.3 m/sec)

Unit ID	Regulation	Index Number	Basis of Determination*
RD128FL1	40 CFR Part 63, Subpart A	63A-0003	<p>REQUIRED UNDER 40 CFR 63 = Flare is required by a Subpart under 40 CFR Part 63.</p> <p>HEAT CONTENT SPECIFICATION = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8).</p> <p>FLARE ASSIST TYPE = Non-assisted</p> <p>FLARE EXIT VELOCITY = Flare exit velocity is less than 60 ft/s (18.3 m/sec)</p>
PE252FG1	40 CFR Part 60, Subpart DDD	60DDD-0010	<p>FLANGES AND OTHER CONNECTORS (ANY SERVICE) [NSPS DDD] = FLANGES OR CONNECTORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE</p> <p>OPEN-ENDED VALVES OR LINES (ANY SERVICE) [NSPS DDD] = OPEN-ENDED VALVES OR LINES IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE [NSPS DDD] = PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>PUMPS IN LIGHT LIQUID SERVICE [NSPS DDD] = PUMPS IN LIGHT LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE [NSPS DDD] = VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>CONTINUOUS PROCESS [NSPS DDD] = THE AFFECTED FACILITY IS A CONTINUOUS PROCESS</p> <p>40 CFR 60 (NSPS) SUBPART DDD CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE = AFTER JANUARY 10, 1989</p> <p>COMPLYING WITH § 60.482-2 = YES</p> <p>COMPLYING WITH § 60.482-6 = YES</p> <p>COMPLYING WITH § 60.482-7 = YES</p> <p>COMPLYING WITH § 60.482-8 = YES</p> <p>40 CFR 60 (NSPS) SUBPART DDD DESIGN CAPACITY = FACILITY HAS DESIGN CAPACITY TO PRODUCE GREATER THAN OR EQUAL TO 1,000 MEGAGRAMS PER YEAR</p> <p>CLOSED VENT SYSTEMS AND CONTROL DEVICES (ANY SERVICE) [NSPS DDD] = CLOSED VENT SYSTEM AND CONTROL DEVICES IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>COMPLYING WITH § 60.482-8 = YES</p> <p>COMPRESSORS (ANY SERVICE) [NSPS DDD] = COMPRESSORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>PUMPS IN HEAVY LIQUID SERVICE [NSPS DDD] = PUMPS IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>VALVES IN HEAVY LIQUID SERVICE [NSPS DDD] = VALVES IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>SAMPLING CONNECTION SYSTEMS (ANY SERVICE) [NSPS DDD] = SAMPLING CONNECTION SYSTEMS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>COMPLYING WITH § 60.482-3 = YES</p> <p>COMPLYING WITH § 60.482-8 = YES</p> <p>COMPLYING WITH § 60.482-10 = YES</p> <p>COMPLYING WITH § 60.482-5 = YES</p>

Unit ID	Regulation	Index Number	Basis of Determination*
PE252FG1	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Existing Source = Fugitive unit contains equipment in an existing Miscellaneous Chemical Processing Unit.
RD005FG7	40 CFR Part 60, Subpart DDD	60DDD-0020	<p>FLANGES AND OTHER CONNECTORS (ANY SERVICE) [NSPS DDD] = FLANGES OR CONNECTORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE</p> <p>OPEN-ENDED VALVES OR LINES (ANY SERVICE) [NSPS DDD] = OPEN-ENDED VALVES OR LINES IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE [NSPS DDD] = PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>PUMPS IN LIGHT LIQUID SERVICE [NSPS DDD] = PUMPS IN LIGHT LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE [NSPS DDD] = VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>CONTINUOUS PROCESS [NSPS DDD] = THE AFFECTED FACILITY IS A CONTINUOUS PROCESS</p> <p>40 CFR 60 (NSPS) SUBPART DDD CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE = AFTER JANUARY 10, 1989</p> <p>COMPLYING WITH § 60.482-2 = YES</p> <p>COMPLYING WITH § 60.482-6 = YES</p> <p>COMPLYING WITH § 60.482-7 = YES</p> <p>COMPLYING WITH § 60.482-8 = YES</p> <p>40 CFR 60 (NSPS) SUBPART DDD DESIGN CAPACITY = FACILITY HAS DESIGN CAPACITY TO PRODUCE GREATER THAN OR EQUAL TO 1,000 MEGAGRAMS PER YEAR</p> <p>CLOSED VENT SYSTEMS AND CONTROL DEVICES (ANY SERVICE) [NSPS DDD] = CLOSED VENT SYSTEM AND CONTROL DEVICES IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>COMPRESSORS (ANY SERVICE) [NSPS DDD] = COMPRESSORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>PUMPS IN HEAVY LIQUID SERVICE [NSPS DDD] = NO PUMPS IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>VALVES IN HEAVY LIQUID SERVICE [NSPS DDD] = NO VALVES IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>SAMPLING CONNECTION SYSTEMS (ANY SERVICE) [NSPS DDD] = SAMPLING CONNECTION SYSTEMS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>COMPLYING WITH § 60.482-3 = YES</p> <p>COMPLYING WITH § 60.482-10 = YES</p> <p>COMPLYING WITH § 60.482-5 = YES</p>
RD005FG7	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Existing Source = Fugitive unit contains equipment in an existing Miscellaneous Chemical Processing Unit.
GRPP3CONT	40 CFR Part 63, Subpart FFFF	63FFFF-0002	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a flare is being used for control.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Determined Hal = The emission stream is determined to be non-halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or a waiver has not been requested.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = The closed vent system contains no bypass line.</p>
PE252VF652	40 CFR Part 63, Subpart FFFF	63FFFF-0001	<p>Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1).</p> <p>Recovery Device = The TRE index is maintained without a recovery device.</p>
PE256D265	40 CFR Part 60, Subpart NNN	60NNN-0001	40 CFR 60 (NSPS) SUBPART NNN CHEMICALS = DISTILLATION UNIT DOES NOT PRODUCE ANY CHEMICAL LISTED IN 40 CFR § 60.667 AS A PRODUCT, CO-PRODUCT, BY-PRODUCT, OR INTERMEDIATE
PRO3AIR1	40 CFR Part 60, Subpart DDD	60DDD-0006	<p>CONTROL OF CONTINUOUS EMISSIONS [NSPS DDD] = SOME CONTINUOUS EMISSIONS ARE CONTROLLED IN AN EXISTING CONTROL DEVICE (AS DEFINED IN 40 CFR 60.561)</p> <p>MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE</p> <p>POLYOLEFIN PRODUCTION [NSPS DDD] = MORE THAN ONE POLYOLEFIN IS PRODUCED</p> <p>CONTINUOUS CONTROL DEVICE [NSPS DDD] = FLARE</p> <p>CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS</p> <p>PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT CONTINUOUS EMISSIONS</p> <p>CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989</p> <p>UNCONTROLLED ANNUAL EMISSIONS [NSPS DDD] = UNCONTROLLED ANNUAL EMISSIONS GREATER THAN OR EQUAL TO 1.6 MEGAGRAMS/YEAR (1.76 TONS/YEAR)</p> <p>ANNUAL EMISSIONS ENTERING CONTROL DEVICE [NSPS DDD] = ANNUAL EMISSIONS ENTERING CONTROL DEVICE LESS THAN CALCULATED THRESHOLD EMISSIONS (CTE) LEVELS CALCULATED IN 'TABLE 3'</p> <p>EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE</p> <p>WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS [NSPS DDD] = WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS GREATER THAN OR EQUAL TO 0.10%</p> <p>'TABLE 3' CONTROL REQUIREMENTS [NSPS DDD] = CALCULATIONS FROM 'TABLE 3' DO NOT REQUIRE CONTROLS</p> <p>'TABLE 2' THRESHOLD EMISSION RATES [NSPS DDD] = UNCONTROLLED EMISSION RATE GREATER THAN TO UNCONTROLLED THRESHOLD EMISSION RATES IN 'TABLE 2' OF 40 CFR 60.560</p>
PRO3AIRLC	40 CFR Part 60, Subpart DDD	60DDD-0005	<p>CONTROL OF CONTINUOUS EMISSIONS [NSPS DDD] = ALL VENT GAS STREAMS ARE UNCONTROLLED</p> <p>MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE</p> <p>POLYOLEFIN PRODUCTION [NSPS DDD] = MORE THAN ONE POLYOLEFIN IS PRODUCED</p> <p>CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS</p> <p>PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT CONTINUOUS EMISSIONS</p> <p>CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989</p> <p>UNCONTROLLED ANNUAL EMISSIONS [NSPS DDD] = UNCONTROLLED ANNUAL EMISSIONS LESS THAN 1.6 MEGAGRAMS/YEAR (1.76 TONS/YEAR)</p> <p>EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE</p> <p>WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS [NSPS DDD] = WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS LESS THAN 0.10%</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			'TABLE 2' THRESHOLD EMISSION RATES [NSPS DDD] = UNCONTROLLED EMISSION RATE GREATER THAN TO UNCONTROLLED THRESHOLD EMISSION RATES IN 'TABLE 2' OF 40 CFR 60.560
PRO3AIRLF	40 CFR Part 60, Subpart DDD	60DDD-0004	<p>CONTROL OF CONTINUOUS EMISSIONS [NSPS DDD] = ALL VENT GAS STREAMS ARE UNCONTROLLED</p> <p>MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE</p> <p>POLYOLEFIN PRODUCTION [NSPS DDD] = MORE THAN ONE POLYOLEFIN IS PRODUCED</p> <p>CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS</p> <p>PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT CONTINUOUS EMISSIONS</p> <p>CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989</p> <p>UNCONTROLLED ANNUAL EMISSIONS [NSPS DDD] = UNCONTROLLED ANNUAL EMISSIONS LESS THAN 1.6 MEGAGRAMS/YEAR (1.76 TONS/YEAR)</p> <p>EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE</p> <p>WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS [NSPS DDD] = WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS LESS THAN 0.10%</p> <p>'TABLE 2' THRESHOLD EMISSION RATES [NSPS DDD] = UNCONTROLLED EMISSION RATE GREATER THAN TO UNCONTROLLED THRESHOLD EMISSION RATES IN 'TABLE 2' OF 40 CFR 60.560</p>
PRO3CONT	40 CFR Part 60, Subpart DDD	60DDD-0001	<p>CONTROL OF CONTINUOUS EMISSIONS [NSPS DDD] = ALL CONTINUOUS EMISSIONS ARE CONTROLLED IN AN EXISTING CONTROL DEVICE (AS DEFINED IN 40 CFR 60.561)</p> <p>MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE</p> <p>POLYOLEFIN PRODUCTION [NSPS DDD] = MORE THAN ONE POLYOLEFIN IS PRODUCED</p> <p>CONTINUOUS CONTROL DEVICE [NSPS DDD] = FLARE</p> <p>CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS</p> <p>PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT CONTINUOUS EMISSIONS</p> <p>CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989</p> <p>UNCONTROLLED ANNUAL EMISSIONS [NSPS DDD] = UNCONTROLLED ANNUAL EMISSIONS GREATER THAN OR EQUAL TO 1.6 MEGAGRAMS/YEAR (1.76 TONS/YEAR)</p> <p>ANNUAL EMISSIONS ENTERING CONTROL DEVICE [NSPS DDD] = ANNUAL EMISSIONS ENTERING CONTROL DEVICE GREATER THAN OR EQUAL TO CALCULATED THRESHOLD EMISSIONS (CTE) LEVELS CALCULATED IN 'TABLE 3'</p> <p>EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE</p> <p>WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS [NSPS DDD] = WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS GREATER THAN OR EQUAL TO 0.10%</p> <p>EMISSION REDUCTION FROM CONTROL DEVICE [NSPS DDD] = EXISTING CONTROL DEVICE (AS DEFINED IN 40 CFR 60.561) REDUCES EMISSIONS BY GREATER THAN OR EQUAL TO 98% OR LESS THAN EQUAL TO 20 PARTS PER MILLION BY VOLUME (PPMV)</p>
PRO3EMER	40 CFR Part 60, Subpart DDD	60DDD-0003	<p>EMERGENCY VENT [NSPS DDD] = EMISSIONS ARE AN EMERGENCY VENT STREAM FROM A NEW MODIFIED OR RECONSTRUCTED FACILITY</p> <p>MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE</p> <p>POLYOLEFIN PRODUCTION [NSPS DDD] = MORE THAN ONE POLYOLEFIN IS PRODUCED</p> <p>CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS</p> <p>PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT INTERMITTENT EMISSIONS</p> <p>CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE ‘TABLE 2’ THRESHOLD EMISSION RATES [NSPS DDD] = UNCONTROLLED EMISSION RATE GREATER THAN TO UNCONTROLLED THRESHOLD EMISSION RATES IN ‘TABLE 2’ OF 40 CFR 60.560
PRO3INTER	40 CFR Part 60, Subpart DDD	60DDD-0002	EMERGENCY VENT [NSPS DDD] = EMISSIONS ARE NOT AN EMERGENCY VENT STREAM FROM A NEW MODIFIED OR RECONSTRUCTED FACILITY MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE POLYOLEFIN PRODUCTION [NSPS DDD] = MORE THAN ONE POLYOLEFIN IS PRODUCED CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS EXISTING CONTROL DEVICE [NSPS DDD] = VENT STREAM IS CONTROLLED NOT IN AN EXISTING CONTROL DEVICE (AS DEFINED IN 40 CFR 60.561) WHICH HAS NOT BEEN RECONSTRUCTED REPLACED OR ITS OPERATING CONDITIONS MODIFIED AS A RESULT OF STATE OR LOCAL REGULATIONS PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT INTERMITTENT EMISSIONS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989 INTERMITTENT CONTROL DEVICE [NSPS DDD] = FLARE EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE
PROPEPPALF	40 CFR Part 60, Subpart DDD	60DDD-0012	CONTROL OF CONTINUOUS EMISSIONS [NSPS DDD] = ALL VENT GAS STREAMS ARE UNCONTROLLED MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE POLYOLEFIN PRODUCTION [NSPS DDD] = MORE THAN ONE POLYOLEFIN IS PRODUCED CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT CONTINUOUS EMISSIONS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989 UNCONTROLLED ANNUAL EMISSIONS [NSPS DDD] = UNCONTROLLED ANNUAL EMISSIONS LESS THAN 1.6 MEGAGRAMS/YEAR (1.76 TONS/YEAR) EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS [NSPS DDD] = WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS LESS THAN 0.10%
PROPEPCNT	40 CFR Part 60, Subpart DDD	60DDD-0010	CONTROL OF CONTINUOUS EMISSIONS [NSPS DDD] = ALL CONTINUOUS EMISSIONS ARE CONTROLLED IN AN EXISTING CONTROL DEVICE (AS DEFINED IN 40 CFR 60.561) MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE POLYOLEFIN PRODUCTION [NSPS DDD] = MORE THAN ONE POLYOLEFIN IS PRODUCED CONTINUOUS CONTROL DEVICE [NSPS DDD] = FLARE CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT CONTINUOUS EMISSIONS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989 UNCONTROLLED ANNUAL EMISSIONS [NSPS DDD] = UNCONTROLLED ANNUAL EMISSIONS GREATER THAN OR EQUAL TO 1.6 MEGAGRAMS/YEAR (1.76 TONS/YEAR) ANNUAL EMISSIONS ENTERING CONTROL DEVICE [NSPS DDD] = ANNUAL EMISSIONS ENTERING CONTROL DEVICE GREATER THAN OR EQUAL TO CALCULATED THRESHOLD EMISSIONS (CTE) LEVELS CALCULATED IN ‘TABLE 3’ EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE

Unit ID	Regulation	Index Number	Basis of Determination*
			WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS [NSPS DDD] = WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS GREATER THAN OR EQUAL TO 0.10% EMISSION REDUCTION FROM CONTROL DEVICE [NSPS DDD] = EXISTING CONTROL DEVICE (AS DEFINED IN 40 CFR 60.561) REDUCES EMISSIONS BY GREATER THAN OR EQUAL TO 98% OR LESS THAN EQUAL TO 20 PARTS PER MILLION BY VOLUME (PPMV)
PROPEPEMR	40 CFR Part 60, Subpart DDD	60DDD-0011	EMERGENCY VENT [NSPS DDD] = EMISSIONS ARE AN EMERGENCY VENT STREAM FROM A NEW MODIFIED OR RECONSTRUCTED FACILITY MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE POLYOLEFIN PRODUCTION [NSPS DDD] = MORE THAN ONE POLYOLEFIN IS PRODUCED CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT INTERMITTENT EMISSIONS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989 EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE
PROPEPUCT	40 CFR Part 60, Subpart DDD	60DDD-0013	CONTROL OF CONTINUOUS EMISSIONS [NSPS DDD] = ALL VENT GAS STREAMS ARE UNCONTROLLED MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE POLYOLEFIN PRODUCTION [NSPS DDD] = MORE THAN ONE POLYOLEFIN IS PRODUCED CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT CONTINUOUS EMISSIONS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989 UNCONTROLLED ANNUAL EMISSIONS [NSPS DDD] = UNCONTROLLED ANNUAL EMISSIONS LESS THAN 1.6 MEGAGRAMS/YEAR (1.76 TONS/YEAR) EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS [NSPS DDD] = WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS LESS THAN 0.10%
PE252R334A	40 CFR Part 60, Subpart RRR	60RRR-0002	CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS NOT PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE
PE252R500	40 CFR Part 60, Subpart RRR	60RRR-0005	CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS NOT PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE
PE252R600	40 CFR Part 60, Subpart RRR	60RRR-0006	CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS NOT PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE
PE256R250	40 CFR Part 60, Subpart RRR	60RRR-0001	CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS NOT PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE
PE256R403	40 CFR Part 60, Subpart RRR	60RRR-0004	CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS NOT PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE
RD005R3200	40 CFR Part 60, Subpart RRR	60RRR-0010	CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS NOT PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE
RD005R3400	40 CFR Part 60, Subpart RRR	60RRR-0011	CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS NOT PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE
PRO3AIR1	40 CFR Part 63, Subpart FFFF	63FFFF-0003	>1000 lb/yr = The process has uncontrolled hydrogen halide and halogen HAP emissions from process vents of less than 1,000 lb/yr.

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less.</p> <p>Startup 2003 = The affected source startup was before November 10, 2003.</p> <p>Other Operations = The MCPU includes operations other than those listed in § 63.2435(c).</p> <p>Shared Batch Vent = The MCPU does not include a batch process vent that also is part of a CMPU as defined in subparts F and G of this part 63.</p> <p>63.100 CMPU = The MCPU is not a CMPU defined in § 63.100.</p> <p>New Source = The MCPU is an existing affected source.</p> <p>PUG = The MCPU is not part of a process unit group (PUG).</p> <p>G2/<1000 lb/yr = The process does not include Group 2 batch process vents and/or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr.</p> <p>Startup 2002 = The affected source initial startup was before April 4, 2002.</p> <p>PP Alt = The MCPU is complying with the emission limitations and work practice standards contained in Tables 1 through 7.</p> <p>Design Eval = Compliance with emission limits is being determined by performance test.</p> <p>Batch Process Vents = The source does not include batch process vents.</p>
PRO3AIRLC	40 CFR Part 63, Subpart FFFF	63FFFF-0006	<p>>1000 lb/yr = The process has uncontrolled hydrogen halide and halogen HAP emissions from process vents of less than 1,000 lb/yr.</p> <p>Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less.</p> <p>Startup 2003 = The affected source startup was before November 10, 2003.</p> <p>Other Operations = The MCPU includes operations other than those listed in § 63.2435(c).</p> <p>Shared Batch Vent = The MCPU does not include a batch process vent that also is part of a CMPU as defined in subparts F and G of this part 63.</p> <p>63.100 CMPU = The MCPU is not a CMPU defined in § 63.100.</p> <p>New Source = The MCPU is an existing affected source.</p> <p>PUG = The MCPU is not part of a process unit group (PUG).</p> <p>G2/<1000 lb/yr = The process does not include Group 2 batch process vents and/or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr.</p> <p>Startup 2002 = The affected source initial startup was before April 4, 2002.</p> <p>PP Alt = The MCPU is complying with the emission limitations and work practice standards contained in Tables 1 through 7.</p> <p>Design Eval = Compliance with emission limits is being determined by performance test.</p> <p>Batch Process Vents = The source does not include batch process vents.</p>
PRO3AIRLF	40 CFR Part 63, Subpart FFFF	63FFFF-0005	<p>>1000 lb/yr = The process has uncontrolled hydrogen halide and halogen HAP emissions from process vents of less than 1,000 lb/yr.</p> <p>Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less.</p> <p>Startup 2003 = The affected source startup was before November 10, 2003.</p> <p>Other Operations = The MCPU includes operations other than those listed in § 63.2435(c).</p> <p>Shared Batch Vent = The MCPU does not include a batch process vent that also is part of a CMPU as defined in subparts F and G of this part 63.</p> <p>63.100 CMPU = The MCPU is not a CMPU defined in § 63.100.</p> <p>New Source = The MCPU is an existing affected source.</p> <p>PUG = The MCPU is not part of a process unit group (PUG).</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>G2/<1000 lb/yr = The process does not include Group 2 batch process vents and/or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr.</p> <p>Startup 2002 = The affected source initial startup was before April 4, 2002.</p> <p>PP Alt = The MCPU is complying with the emission limitations and work practice standards contained in Tables 1 through 7.</p> <p>Design Eval = Compliance with emission limits is being determined by performance test.</p> <p>Batch Process Vents = The source does not include batch process vents.</p>
PRO3CONT	40 CFR Part 63, Subpart FFFF	63FFFF-0002	<p>>1000 lb/yr = The process has uncontrolled hydrogen halide and halogen HAP emissions from process vents of less than 1,000 lb/yr.</p> <p>Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less.</p> <p>Startup 2003 = The affected source startup was before November 10, 2003.</p> <p>Other Operations = The MCPU includes operations other than those listed in § 63.2435(c).</p> <p>Shared Batch Vent = The MCPU does not include a batch process vent that also is part of a CMPU as defined in subparts F and G of this part 63.</p> <p>63.100 CMPU = The MCPU is not a CMPU defined in § 63.100.</p> <p>New Source = The MCPU is an existing affected source.</p> <p>PUG = The MCPU is not part of a process unit group (PUG).</p> <p>G2/<1000 lb/yr = The process does not include Group 2 batch process vents and/or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr.</p> <p>Startup 2002 = The affected source initial startup was before April 4, 2002.</p> <p>PP Alt = The MCPU is complying with the emission limitations and work practice standards contained in Tables 1 through 7.</p> <p>Design Eval = Compliance with emission limits is being determined by performance test.</p> <p>Batch Process Vents = The source does not include batch process vents.</p>
PRO3EMER	40 CFR Part 63, Subpart FFFF	63FFFF-0004	<p>Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less.</p> <p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Other Operations = The MCPU includes operations other than those listed in § 63.2435(c).</p> <p>63.100 CMPU = The MCPU is not a CMPU defined in § 63.100.</p> <p>Vent Emission Control = Reduce uncontrolled organic HAP emissions from all batch process vents within the process by venting through a closed-vent system to a flare per Table 2.1.c.</p> <p>G2/<1000 lb/yr = The process does not include Group 2 batch process vents and/or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr.</p> <p>Prior Eval = Data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or no waiver has been requested.</p> <p>Negative Pressure = The closed vent system is operated and maintained at atmospheric pressure.</p> <p>Bypass Line = The closed vent system does not contain a bypass line that could divert the vent stream away from the control device.</p>
PRO3INTER	40 CFR Part 63, Subpart FFFF	63FFFF-0001	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Designated HAL = The emission stream is not designated as halogenated.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Vent Emission Control = Reduce uncontrolled organic HAP emissions from all batch process vents within the process by venting through a closed-vent system to a flare per Table 2.1.c.</p> <p>Prior Eval = Data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or no waiver has been requested.</p> <p>Negative Pressure = The closed vent system is operated and maintained at atmospheric pressure.</p> <p>Bypass Line = The closed vent system does not contain a bypass line that could divert the vent stream away from the control device.</p>
PROPEPP	40 CFR Part 63, Subpart F	63F-0002	Applicable Chemicals = THE CHEMICAL MANUFACTURING PROCESS UNIT DOES NOT MANUFACTURE, AS A PRIMARY PRODUCT, ONE OR MORE OF THE CHEMICALS LISTED IN 40 CFR § 63.100(B)(1)(I) OR 40 CFR § 63.100(B)(1)(II)

* - The “unit attributes” or operating conditions that determine what requirements apply

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 19959	Issuance Date: 12/05/2013
Authorization No.: 20505	Issuance Date: 07/26/2006
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.103	Version No./Date: 09/04/2000
Number: 106.122	Version No./Date: 09/04/2000
Number: 106.124	Version No./Date: 03/14/1997
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.373	Version No./Date: 09/04/2000
Number: 106.393	Version No./Date: 09/04/2000
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.473	Version No./Date: 09/04/2000
Number: 106.475	Version No./Date: 09/04/2000
Number: 106.476	Version No./Date: 09/04/2000
Number: 106.492	Version No./Date: 09/04/2000
Number: 51	Version No./Date: 07/20/1992
Number: 106	Version No./Date: 07/20/1992

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sandblasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the “Maximum Allowable Emission Rate Table”, or “MAERT” for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit’s compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Compliance Assurance Monitoring (CAM):

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information	
ID No.: PRO3CONT	
Control Device ID No.: PEo85FL1	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart DDD	SOP Index No.: 6oDDD-0001
Pollutant: VOC/TOC	Main Standard: § 60.562-1(a)(1)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: n/a	
Deviation Limit: Absence of pilot flame.	
Basis of CAM: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

Unit/Group/Process Information	
ID No.: PROPEPPCNT	
Control Device ID No.: RD128FL1	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart DDD	SOP Index No.: 60DDD-0010
Pollutant: VOC/TOC	Main Standard: § 60.562-1(a)(1)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: n/a	
Deviation Limit: Absence of a pilot flame.	
Basis of CAM: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

Compliance History Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on 03/20/2014.
2. The compliance history review evaluated the period from 12/06/2008 to 12/06/2013.

Site rating: 5.61 Company rating: 2.15

(High < 0.10; Satisfactory > 0.10 and < 55; Unsatisfactory > 55)

3. Has the permit changed on the basis of the compliance history or site/company rating?No

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS?No
2. Is a compliance plan and schedule included in the permit?.....No

Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
OP-UA3 - Storage Tank/Vessel Attributes
OP-UA4 - Loading/Unloading Operations Attributes
OP-UA5 - Process Heater/Furnace Attributes
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
OP-UA7 - Flare Attributes
OP-UA8 - Coal Preparation Plant Attributes
OP-UA9 - Nonmetallic Mineral Process Plant Attributes
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
OP-UA11 - Stationary Turbine Attributes
OP-UA12 - Fugitive Emission Unit Attributes
OP-UA13 - Industrial Process Cooling Tower Attributes
OP-UA14 - Water Separator Attributes
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
OP-UA16 - Solvent Degreasing Machine Attributes
OP-UA17 - Distillation Unit Attributes
OP-UA18 - Surface Coating Operations Attributes
OP-UA19 - Wastewater Unit Attributes
OP-UA20 - Asphalt Operations Attributes
OP-UA21 - Grain Elevator Attributes
OP-UA22 - Printing Attributes
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
OP-UA25 - Synthetic Fiber Production Attributes
OP-UA26 - Electroplating and Anodizing Unit Attributes
OP-UA27 - Nitric Acid Manufacturing Attributes
OP-UA28 - Polymer Manufacturing Attributes
OP-UA29 - Glass Manufacturing Unit Attributes
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Metallic Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing
OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes

OP-UA40 - Ferroalloy Production Facility Attributes
OP-UA41 - Dry Cleaning Facility Attributes
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes
OP-UA45 - Surface Impoundment Attributes
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes
OP-UA47 - Ship Building and Ship Repair Unit Attributes
OP-UA48 - Air Oxidation Unit Process Attributes
OP-UA49 - Vacuum-Producing System Attributes
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
OP-UA51 - Dryer/Kiln/Oven Attributes
OP-UA52 - Closed Vent Systems and Control Devices
OP-UA53 - Beryllium Processing Attributes
OP-UA54 - Mercury Chlor-Alkali Cell Attributes
OP-UA55 - Transfer System Attributes
OP-UA56 - Vinyl Chloride Process Attributes
OP-UA57 - Cleaning/Depainting Operation Attributes
OP-UA58 - Treatment Process Attributes
OP-UA59 - Coke By-Product Recovery Plant Attributes
OP-UA60 - Chemical Manufacturing Process Unit Attributes
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes
OP-UA62 - Glycol Dehydration Unit Attributes
OP-UA63 - Vegetable Oil Production Attributes